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August 31, 2011

Mr. Darrick Moe
Western Area Power Administration
Desert Southwest Regional Manager
P.O. Box 6457
Phoenix, AZ 85005-6457

Re: Comments of the Pechanga Band of Luiseño Indians;
Boulder Canyon Project Post-2017 Marketing

Dear Mr. Moe,

This firm represents the Pechanga Band of Luiseño Indians ("the Tribe" or "Pechanga"). The Western Area Power Administration ("Western") has requested the submission of additional comments concerning its proposal ("Proposal") relating to the application of the Power Marketing Initiative ("PMI") to the marketing of Boulder Canyon Project ("BCP") power after 2017. This letter provides the Tribe's additional comments on the Proposal.

The Tribe would first like to note that it substantially agrees with the actions contemplated in the Proposal. It further requests that Western continue with the post 2017 marketing process without delay. It anticipates that Tribes receiving allocations will face a number of challenges, particularly relating to the delivery of power to their reservations. Transmission issues in particular require long time horizons to resolve. Accordingly, the marketing process should continue efficiently, so that new contractors can be informed of potential allocations and commence with those necessary transmission arrangements.

The Tribe filed extensive comments on the Proposal on January 27, 2010, and requests (as Western has indicated will be the case) that these comments be reviewed during Western's further consideration of this matter. In this regard, the Tribe particularly requests that Western take into account the Tribe's comments relating to the many changes that have taken place since the construction of the Boulder Canyon Project and the original adoption of the PMI.

As was stated in the Tribe's original comments, the world has changed substantially from these times, and these changes need to be considered (and reflected) in the marketing of post-2017 BCP power. These changes particularly need to be considered in the context of evaluating whether to renew allocations and (if they are renewed) the appropriate size of such allocations.

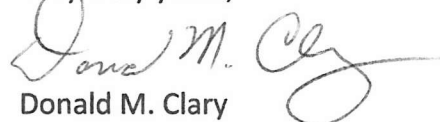
The Tribe further believes that, in implementing the PMI in the context of the Boulder Canyon Project, Western should actively investigate, review and consider the difficulties that tribes have had (thus far) in obtaining delivery of their allocations from Western's projects, and take affirmative steps to remedy those difficulties. Western now has had substantial experience in this regard (since the original adoption of the PMI), and evaluating this experience should be very helpful on this point. The Tribe additionally requests that Western expressly consider and address Pechanga's request that existing contractors (who have greatly benefited from the Project over the years) be required (in exchange for continued service) to at least cooperate and assist in the integration of power by new contractors.

In its original comments, Pechanga outlined the difficulties it has experienced with regard to the use of its allocation of power from the Parker-Davis Project. It is difficult for the Tribe to understand why (as a condition to their continued use and enjoyment of Western's power and services) existing contractors are not required to more actively cooperate in the efficient use of Western power by new contractors. This should be changed.

Finally, the Tribe would like to thank Western's staff for the assistance and cooperation that has been provided to the Tribe and others during this process. They have been very helpful.

We appreciate the opportunity to make these comments.

Very truly yours,


Donald M. Clary

cc: John Macarro, General Counsel